

1 **IN THE UNITED STATES DISTRICT COURT**
2 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

3
4 People of the State of California, et al.

5 v.

6 Meta Platforms, Inc., Instagram, LLC, Meta
7 Payments, Inc., Meta Platforms Technologies, LLC
8 -----

9 Office of the Attorney General, State of Florida,
10 Department of Legal Affairs

11 v.

12 Meta Platforms, Inc., Instagram, LLC., Meta
13 Payments, Inc.
14 -----

15 State of Montana, ex rel. Austin Knudsen, Attorney
16 General

17 v.

18 Meta Platforms, Inc., Instagram, LLC, Facebook
19 Holdings, LLC, Facebook Operations, LLC, Meta
20 Payments, Inc., Meta Platforms Technologies, LLC,
21 Siculus, Inc.
22 -----

23 IN RE: SOCIAL MEDIA ADOLESCENT
24 ADDICTION/PERSONAL INJURY PRODUCTS
25 LIABILITY LITIGATION

26 THIS DOCUMENT RELATES TO:

27 4:23-cv-05448; 4:23-cv-05885; 4:24-cv-00805
28

MDL No. 3047

Case No.: 4:23-cv-05448-YGR

4:23-cv-05885-YGR

4:24-cv-00805-YGR

**~~[PROPOSED]~~ ORDER ADDRESSING
LITIGATION HOLD NOTICES, SEARCH
TERMS, AND CUSTODIANS IN CASES
BROUGHT BY STATE ATTORNEYS
GENERAL**

Honorable Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

On October 15, 2024, the State Attorneys General Plaintiffs (the “State AGs”) and Defendants Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; and Meta Platforms Technologies, LLC (“Meta”) submitted a Joint Letter Brief setting forth their positions on disputes concerning litigation hold notices, search terms, and custodians. ECF No. 1217. On October 24, 2024, during a Discovery Management Conference (“DMC”), the Court heard oral argument on the issues outlined in the Parties’ Joint Letter Brief.

1 Having reviewed the Joint Letter Brief and having heard the arguments of the Parties, and as stated
2 on the record during the DMC, the Court **ORDERS** as follows:

3 1. Each State AG shall provide Meta with a weekly update including litigation hold
4 information for all recipients at state agencies. Such information shall include the names, titles,
5 and agency affiliations of all state agency personnel from the state agencies for which the Court
6 held the State AG has legal control over the agency's documents in ECF No. 1117 who have
7 received litigation holds in connection with this litigation, and the date on which the hold notice
8 was first provided to each individual. If any State AG cannot provide such information, that State
9 AG shall so state in the weekly report.

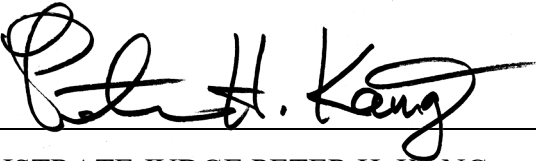
10 2. By November 1, 2024, each State AG for Arizona, California, Colorado, Delaware,
11 Illinois, Kentucky, Maryland, Michigan, Minnesota, Missouri, New York, Oregon, Pennsylvania,
12 and Rhode Island shall provide to Meta a proposed list of state agency custodians likely to possess
13 information relevant to this litigation or responsive to Meta's discovery requests served on the
14 State AGs, along with a proposed set of search terms to be used to locate such responsive
15 documents. If any of these State AGs cannot provide such proposed state agency custodian or
16 search terms for any of the state agencies for which the Court held the State AG has legal control
17 over the agency's documents in ECF No. 1117, that State AG shall so state by November 1, 2024.

18 3. During the week of November 4 through 8, 2024, the State AGs for Arizona,
19 California, Colorado, Delaware, Illinois, Kentucky, Maryland, Michigan, Minnesota, Missouri,
20 New York, Oregon, Pennsylvania, and Rhode Island and Meta shall meet and confer regarding
21 proposed search terms and proposed custodians. These State AGs shall undertake reasonable
22 efforts to ensure that all necessary decision makers are on each such call, to facilitate efficient
23 meet-and-confer efforts. And Meta shall make its counsel available in a timely manner. Any
24 disputes regarding proposed search terms and custodians that remain unresolved may be addressed
25 through letter briefing pursuant to the Court's dispute resolution procedure and raised at the next
26 DMC.

27 4. **Meta and the State AGs for the remaining twenty States shall continue meeting and**
28 **conferring diligently and in a manner consistent with this Order.**

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2 **IT IS SO ORDERED.**

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4 Dated: October 29, 2024

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6 MAGISTRATE JUDGE PETER H. KANG
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